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Ex Parte VIA ECFS

July 29, 2021

Ms. Marlene H. Dortch

Secretary

Federal Communications Commission

45 L Street NE

Washington, DC 20554

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RE: WC Docket No. 17-97 Call Authentication Trust Anchor

Dear Ms. Dortch,

On Monday July 26, 2021, I communicated by phone with Ramesh Nagarajan Acting Legal Advisor, Wireline Office of Acting Chairwoman Jessica Rosenworcel and Kenneth Carlberg CTO PSHS Bureau

Among the points I highlighted were:

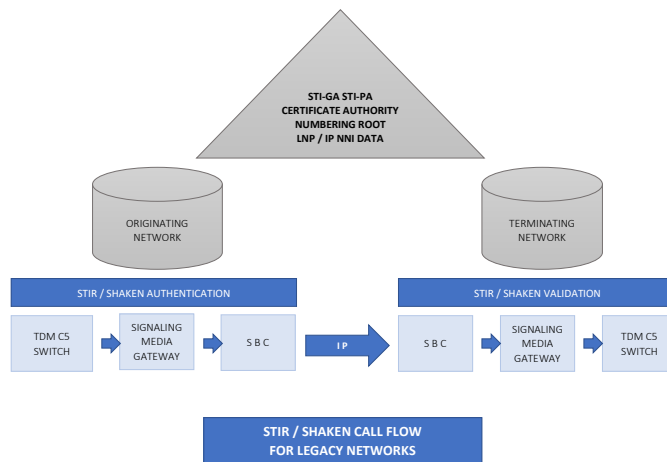
- A. There is a critical need for All IP Interconnection and a Sunset of TDM/SS7 technology in the PSTN to order tackle the long-term problem of robocalls. This is necessary in order to achieve both the goals and requirements of the TRACED Act. STIR/SHAKEN Call Authentication is lost if the call is call is passed via TDM/SS7.
 - a. This is now being actively discussed in the FCC NANC CATA Working group
 - b. This issue is also being adjudicated several states including before the Maryland PUC in CASE NO. 9013
- B. The British are ahead of us in this respect. They have declared a Sunset to TDM/SS7 by 2025.ⁱ There is

anecdotal evidence the CRTC is looking at the issue as well.

- C. The commission has several options moving forward.
 - a. Refresh the record in the Technology Transitions docket. **GN 12-353** as well as aspects of Intercarrier Compensation particularly involving Originating Access
 - b. Issue a NPRM on the Sunset of TDM/SS7 in the United States voice network as we did in the successful transition from Analog to Digital Television.
 - c. The Wireline Competition Bureau could issue a Charge Letter to the NANC to institute a study of what a transition would entail.
 - d. Issue a Report and Order declaring Interconnected SIP a Title II service making all IP Interconnection agreements subject to Section 201 (a) scrutiny and Fair Reasonable and Non-discriminatory [FRAND] terms and condition.

The ATIS/SIP Forum NNI TF has already looked at many of the technical aspects of IP interconnection. ⁱⁱ

I remarked I very little confidence that, so called, Out-Of-Band STIR/SHAKEN solutions will work. In addition, they would be a waste of Service Provider capital that could be better spent on converting the PSTN to an all IP Network. Other techniques using Signaling/Media gateways would address most of the issues in legacy networks. See diagram below.



TDM = Time Division Multiplexing | SBC = Session Border Control

There are emerging issues on how STIR/SHAKEN data is transmitted both inbound and outbound within Enterprises.

I have previously discussed these matters in the 17-97 docket.

iii

If there are any other issues, I'm happy to assist Commission staff at any time.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.

Sincerely,

Richard Shockey
Principal

Via Email to:

Ramesh Nagarajan

Kenneth Carlberg

PS: I would be remiss if I did not point out the recent SIP Forum STIR/SHAKEN virtual summit had over 1300 participants and note that as SIP Forum Chairman it is our plan on keeping these presentations available for the FCC, other government agencies, and the public indefinitely. All of them are free. ^{iv}

i

<https://www.ofcom.org.uk/phones-telecoms-and-internet/information-for-industry/telecoms-competition-regulation/future-fixed-telephone-services>

ii

<https://www.sipforum.org/2015/07/atis-and-sip-forum-complete-new-ip-based-network-to-network-interface-nni-technical-specification/>

iii

<https://ecfsapi.fcc.gov/file/1030722789616/Shockey%20Consulting%20FC%20Exparte%20WC%2017-97%20March%202021%20copy.pdf>

iv

<https://www.sipforum.org/2021-stir-shaken-virtual-summit/schedule/>